

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF ALABAMA
EASTERN DIVISION**

ANDRIETTE ROWELL,

Plaintiff,

v.

CITY OF AUBURN, ALABAMA,

Defendants.

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NO.: 3:07-CV-475-WHA

**PLAINTIFF'S FIRST REQUEST FOR PRODUCTION OF
DOCUMENTS TO DEFENDANT**

Comes now the Plaintiff, Andriette Rowell, and requests the Defendant to permit the Plaintiff to inspect and copy the following documents in accordance with the Federal Rules of Civil Procedure:

1. Documents reflecting the wages and fringe benefits earned or received by Brad Bass from September 1, 2005 through the present.
2. Documents reflecting the pay history of Katie Cox.
3. All evaluations and appraisals of the performance of Brad Bass from September 1, 2005 through the present.
4. Documents reflecting the dates and amount of annual leave and vacation taken by Brad Bass from the beginning of his employment with Defendant through the present.
5. Documents reflecting the dates and amount of annual leave and vacation taken by Andriette Rowell from the beginning of her employment with Defendant through the

present.

6. All documents leading to the establishment of the position of Assistant Administrator/Court Clerk (the position Plaintiff applied for in the Summer of 2005, which is the subject of this suit).

7. All applications and other documents relating to the applications, interviews, consideration of applicants, and selection for the position of Assistant Administrator/Court Clerk in July and August of 2005.

8. All notes taken by Judge Joe Bailey or anyone else during the interviews of any applicants for the position of Assistant Administrator/Court Clerk in July and August 2005.

9. All drafts and earlier versions of the Class Specification for the position of Assistant Administrator/Court Clerk, class code number 1130, effective date July 22, 2005.

10. All Job Classification and Compensation Plan reports submitted by Condrey and Associates, Inc. to Defendant during the period from 2003 to 2006.

11. The City of Auburn Employee Handbook, as it existed from January 2000 through December 31, 2005.

12. The City of Auburn Personnel Policies as they existed from January 1, 2005 through December 31, 2005.

13. All documents concerning the investigation discussed by Judge Joe Bailey with the Plaintiff during her interview with Judge Bailey in August, 2005.

14. All reports generated during or at the conclusion of the investigation referred to in the preceding paragraph.

15. The personnel files and all departmental files of Sallie Heard and Tyrone White.

16. All documents relating to any complaints against the Plaintiff or any investigations of the Plaintiff.

17. Any and all written policies signed by the Plaintiff.

18. Any and all documents relating to any complaints or dissatisfaction concerning Plaintiff's job performance.

19. Each and every document that you intend to introduce at the trial of this case.

20. All notes, memoranda, and other documents of any sort or type created during the process of reaching the decision of selecting the individual to fill the position of Assistant Administrator/Court Clerk in the Summer of 2005.

21. Documents reflecting the pay range or pay scale for the position of Assistant Administrator/Court Clerk and all fringe benefits for that position during the period from the Summer of 2005 through the present.

22. Each and every document that you contend supports or relates to any alleged legitimate, non-discriminatory reasons for failing to promote Plaintiff to the position of Assistant Administrator/Court Clerk.

23. Any and all written policies you contend the Plaintiff violated that played any

part or role in failing to promote her to the position of Assistant Administrator/Court Clerk.

24. Any and all documents reviewed or considered by Judge Joe Bailey in reaching the decision as to who to hire or recommend for the position of Assistant Administrator/Court Clerk in the Summer of 2005.

25. Any and all documents reviewed or considered by Steve Reeves in reaching the decision as to who to hire or recommend for the position of Assistant Administrator/Court Clerk in the Summer of 2005.

26. All e-mails, correspondence, and other communications of any sort or type between Judge Joe Bailey and Steve Reeves concerning the creation of the position of Assistant Administrator/Court Clerk.

27. Any and all correspondence, e-mails, and other communications of any sort or type between Judge Joe Bailey and Steve Reeves concerning the selection process, interviews, criteria, or selection of the person to fill the position of Assistant Administrator/Court Clerk in the Summer of 2005.

28. Any and all documents obtained by the Defendant in response to subpoenas issued by the Defendant during the course of this case.

29. All e-mails, correspondence, and other communications of any sort or type concerning the creation of the position of Assistant Administrator/Court Clerk.

30. Any and all correspondence, e-mails, and other communications of any sort or type concerning the selection process, interviews, criteria, or selection of the person to fill

the position of Assistant Administrator/Court Clerk in the Summer of 2005.

Dated this 17th day of April, 2008.

/s/Gerald L. Miller
GERALD L. MILLER (MIL039)
Attorney for Plaintiff
Andriette Rowell

OF COUNSEL:
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CERTIFICATE OF SERVICE

I hereby certify that on April 17, 2008, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following:

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/s/Gerald L. Miller
Of Counsel